

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

\*\*\*\*\*  
William Justice, \*  
\*  
Plaintiff, \*  
v. \* Civil No. 1:20-cv-00517-PB  
\*  
Christopher T. Sununu, et al., \*  
\*  
Defendants. \*  
\*\*\*\*\*

**NOTICE TO COURT REGARDING PLAINTIFF’S CLAIMS AND DEFENDANTS**

Plaintiff, William Justice, *pro se*, and Defendants, by counsel, the New Hampshire Office of the Attorney General, hereby submit the following notice pursuant to this Court’s Order during the Status Conference held on March 17, 2025:

1. Plaintiff filed an Amended Complaint on or about February 28, 2025. The Amended Complaint included several causes of action that were recommended for dismissal pursuant to the Report and Recommendation (ECF 29). This Court ordered the Parties, over objection by Defendants, to agree to which claims Plaintiff is proceeding on, and which defendants Plaintiff is proceeding against.
2. The Parties, with Plaintiff’s guardian, Wanda Duryea, conferred via telephone on April 7, 2025.
3. The Parties agree that the claims that Plaintiff is proceeding on are the same as the claims allowed to proceed under the Amended Report and Recommendation (ECF No. 29). Both Parties reserve all rights regarding appealing the Report and Recommendation.
4. The Parties further agree that Plaintiff is proceeding against the following Defendants:

- a. Bret Richardson\*
- b. Kenneth K. Kum
- c. Jonathan Boisselle
- d. CO Ryan\*
- e. CO Morissette
- f. Paula L. Mattis
- g. Helen Hanks
- h. Carlene Ferrier, RN
- i. Frank Logan
- j. Joshua Deblois
- k. Paige Kimball
- l. Benjamyn Carver
- m. Deborah Robinson

\*The AGO currently does not represent Defendants Richardson and Ryan, and, upon information and belief, these Defendants have not been served.

4. In submitting this Agreement, the Defendants preserve all defenses.

Respectfully submitted,

DEFENDANTS:  
HELEN HANKS, PAULA MATTIS, DEBORAH  
ROBINSON, CARLENE FERRIER, FRANK LOGAN, III,  
JOSHUA DEBLOIS, BENJAMYN CARVER, PAGE  
KIMBALL, RILEY MORISSETTE, JONATHAN  
BOISSELLE, KENNETH KUM

By their attorney,

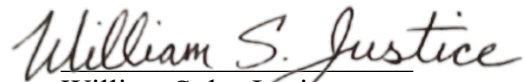
JOHN M. FORMELLA  
ATTORNEY GENERAL

Dated: April 14, 2025

/s/ Catherine A. Denny  
Catherine A. Denny, Bar #275344  
Assistant Attorney General  
Civil Bureau  
NH Department of Justice  
1 Granite Place South  
Concord, NH 03301  
catherine.a.denny@doj.nh.gov  
(603) 271-1354

PLAINTIFF:

Date: 4-14-2025

  
William Soler Justice